EASTERN RESEARCH GROUP, INC.

M E M O R A N D U M

TO: Fred Porter, U.S. Environmental Protection Agency

FROM: Mary Lalley and Chad White, Eastern Research Group

DATE: June 9, 1997

SUBJECT: Final Summary of May 21, 1997 Industrial Combustion Coordinated Rulemaking Coordinating Committee Meeting

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1.0 INTRODUCTION AND PURPOSE OF MEETING

The May 21 meeting of the Coordinating Committee for the Industrial Combustion Coordinated Rulemaking (ICCR) project was the fourth meeting of the congressionally chartered Federal Advisory Committee Act (FACA) committee. The main purposes of the meeting were to (1) develop guidance for Work Groups regarding review of ICCR databases, (2) approve the revised ICCR document, and (3) gain an understanding of various EPA programs. Other items of business were also discussed. A copy of the meeting agenda is included in attachment 1. A copy of the attendance list for the meeting is included in attachment 2.

The remainder of the meeting summary is organized in the following sections:

11.0 Updates from EPA
12.0 Discussion of Next Meetings

2.0 MEMBERSHIP CHANGES

Fred Porter of EPA reported that the EPA has received and reviewed nominations for new members and alternates to several ICCR work groups. Additionally, requests to withdraw work group membership have been received. Nominations and withdrawals are listed for each work group in attachment 3. It was pointed out that Rich Hovan was nominated as a member of the Testing and Monitoring Protocol Work Group and Paul Tucker was nominated as an alternate for Jeff Shumaker on the Incinerator Work Group although their names are not included on the hand-out.
The Coordinating Committee was asked to approve the nominations. Bob Morris pointed out that, according to the ICCR document, the committee members are to review the qualifications of nominees prior to approval. Mr. Morris stated that committee members have not reviewed qualifications for any of the nominees with the exception of Jane Williams. Alex Johnson pointed out that the committee has also reviewed the qualifications of Dick Van Frank. Fred Porter suggested that the committee tentatively approve the nominations and any committee member interested in reviewing qualifications contact him by e-mail.

The Coordinating Committee approved the nominations of Jane Williams to the Process Heater Work Group and Dick Van Frank to the Incinerator Work Group and gave interim approval of nominations of the remaining work group members and alternates listed in attachment 3. Committee members who wish to see the qualifications should email Fred Porter, and he will send copies of the nominations requested. If no issues are raised, the approvals will become final. If issues are raised, they will be discussed at the next Coordinating Committee meeting.

3.0 WORK GROUP STATUS REPORTS

Work group status reports were posted to the TTN for review by Coordinating Committee members prior to the meeting. Work group representatives did not provide status reports at the meeting. Comments and questions regarding the work group status reports were solicited from Coordinating Committee members. One question was asked regarding the Boiler Work Group's decision to form a subgroup to develop a definition for solid waste. Discussion of this item in included in section 7.0.

4.0 STATUS TRACKING

4.1 Tracking Subcommittee

John Paul suggested that a small group be formed to track Coordinating Committee, work group, and subgroup milestones. Mr. Paul suggested that the group could produce a chart or timelines to show the subgroups formed by Work Groups and the Coordinating Committee, the objectives of each group, the timeframe or milestones for achieving the objectives, and the progress of each group. This small group could identify Work Group or subgroup milestones, based on status reports, and identify any overlap or problems. The Coordinating Committee agreed to form the Tracking Subcommittee. Subcommittee members include: Bob Morris, John Paul, Steve Gerritson, and Fred Porter.

4.2 Review of Milestones and Accomplishments

Ruth Mead of ERG presented a summary of ICCR tasks completed to date. This list of milestones in included in attachment 4. Ms. Mead also reported on the status of the ICCR combustion survey. Ms. Mead reported that survey has been approved by EPA and the Office of Management and Budget (OMB). The survey will be sent to facilities in the ICCR database for which there is an indication that material other than fossil fuels are burned in a boiler, process heater or incinerator. The survey, instructions

and a list of recipients was sent to the Government Printing Office in late March. Approximately 12,000 facilities will receive the survey. The survey is to be mailed by June 1 and recipients are to complete and return it by July 15. Mailing out surveys by June 1 is stipulated in the contract with the mailing company. Survey responses received will be entered into the database. The survey (combsurv.wpf), instructions (survdir.wpf) and list of recipients (mail123.xls) have been posted on the TTN, and are accessible from the ICCR main menu under the subheading of Information Collection.

5.0 INVENTORY DATABASE

5.1 Inventory Database Overview

Mae Thomas of Eastern Research Group presented an overview of the ICCR inventory database. An outline of the information presented is included in attachment 5. Following the presentation, Ms. Thomas answered questions from the Coordinating Committee. Following is a summary of questions and corresponding answers.

Miriam Lev-On asked why the inventory database includes a field for emissions. Emission estimates included in the AIRS or OTAG database were included in the inventory database as well as the source of the estimate (e.g. test report, engineering judgment). These fields can be used to identify possible sources of emissions test data and expected pollutants. It is not anticipated that the data in these fields will be used for estimating emissions. The separate emission test database will be the primary source of information for developing emission factors or estimates.

Jeff Shumaker asked if statistics on the amount of data in various fields are available. No analysis has been completed on the percent filled for any of the data fields. Generally, important fields are the most complete. For example, the fuel

type is available for every combustion device and the type of control device, if any, is often available. Additional information, such as the size range, can often be obtained through the source classification code (SCC) assigned to each unit, even if the specific capacity is not listed in the combustor size field.

5.2 Guidance to Work Groups

The Coordinating Committee discussed guidance to be provided to the work groups for reviewing the inventory database. Draft guidance to use as a starting point was included in a memo from Fred Porter to the Coordinating Committee(attachment 6.) The memo also states the goals for the discussion of guidance to the work groups. Comments on the draft guidance are summarized in the following paragraphs.

John Paul expressed a concern regarding how misclassified units will be handled. His concern is that a work group may decide it does not belong in their database and no other work group claims it. He suggested that a group to address miscellaneous misclassified units may be needed. Fred Porter of EPA explained that EPA will be involved and will make sure that units are transferred to the correct group and miscellaneous unclaimed units are addressed.

Miriam Lev-On stated that the source classification codes assigned may be based on a different unit definitions than the ones developed for ICCR. Fred Porter stated that the work groups should use the ICCR definitions.

One Coordinating Committee member predicted that work groups may want to add fields, to provide such information as the subcategory to which a unit is assigned.

Elsie Munsell suggested that it be re-enforced that work groups should add only readily available information and correct

only easily identifiable errors so that the work groups do not become distracted trying to make the perfect database.

Steve Gerritson expressed discomfort with allowing the work groups to make changes to the database and suggested that anything in the guidance that suggests work groups should make changes should be deleted.

Fred Porter explained that an official copy of the database will be maintained by EPA. The version will be revised periodically, to incorporate revisions suggested by the Work Groups and information from the survey, for example.

Several Coordinating Committee members made comments regarding the database and the development of model plants. Alex Johnson asked what the quality assurance process is for determining the database is representative enough for model plant development. Fred Porter responded that as work groups review the database, they will be able to determine if adequate information to develop model plants is available and will have the option to add data to fill in gaps. Miriam Lev-On stated that mentioning model plants is misleading because the work groups will actually be developing model units. Ms. Lev-On stated that it will be necessary to develop model plants eventually to determine impacts on facilities with multiple combustion units.

Greg Adams encouraged EPA to make changes to the database expeditiously. Fred Porter explained that EPA will transfer information from one work group to another quickly using the EPA co-chairs, but intends to revise the master database only periodically. Work groups will not have to wait for the master database to be changed to receive information form other work groups. Jeff Shumaker pointed out the work groups will have to decide if they want to re-do analyses that they are working on every time a new version of the database is released. Elsie

Munsell suggested keeping a running version of proposed changes on the TTN.

Fred Porter explained the Work Group EPA Co-chairs will be responsible for communicating changes between work groups and informing work groups if any revisions that they propose are not accepted.

Several Coordinating Committee members expressed concerns regarding the guidance on identifying control technologies. Alex Johnson suggested that the guidance should be revised to instruct work groups to identify available control technologies. John Ogle, Miriam Lev-On and others pointed out the database provides information on only the control technologies in use. Mr. Johnson also stated that control techniques such as operator training and operating practices are not included in the database. Mr. Johnson suggested that work groups should be adding information on emerging technologies and pollution prevention to the database.

Changes were made to the draft guidance during the meeting to reflect the comments. The Coordinating Committee then reached consensus on guidance to Work Groups for review and use of the inventory database. The guidance agreed upon by the Coordinating Committee is included as attachment 7.

6.0 EMISSIONS TEST DATABASE

6.1 Emission Test Database Overview

Mary Lalley of Eastern Research Group presented an overview of the ICCR emissions database being developed by EPA. The information presented in summarized in an outline in attachment 8. Following the presentation, Ms. Lalley answered questions from the Coordinating Committee. Following are summaries of questions and corresponding answers:

Q: How many of the test reports in the database have data for both HAP's and criteria pollutants.

A: Approximately 50 percent of the test reports include HAP's and criteria pollutants. A record of reports with both HAP's and criteria pollutants is being kept.

Q: What are the criteria for determining whether a report is complete?

A: The report must include raw data from the testing contractor to be considered complete. Reports that included only summary data were not included.

Q: What is the basis for the slide showing fuel distribution?

A: The percentages presented are based on the number of reports for each fuel. It includes only the STIRS data. When AP-42 data are added, there will be more gas-fired boilers.

Q: Is the measured concentration provided in units per stack or sample volume?

A: The units vary. The concentration entered in the database is the most "raw" form provided. It is possible to convert all concentrations to stack concentrations.

Q: Is the date of the report included?

A: Yes.

Q Have the AP-42 test reports been "screened" based on the date of the report?

A No. All reports are entered into the database. This allows the work group to decide if they want to screen reports by date.

Q: Is there a field for the date the unit was built?

A: No. The manufacturer and model number is provided and may help determine the year built.

Q: Is it possible to obtain a list of reports excluded from the database?

A: Yes, a list of reports and the reason they were excluded was kept.

Q: Will turbine and internal combustion engine data from AP-42 also be included in the database?

A: It's possible that the test reports have already been included. EPA will look into whether there are additional reports available through the AP-42 effort.

6.2 Guidance on Emission Test Database Review

The Coordinating Committee discussed guidance to be provided to the work groups for reviewing the emission test database. Draft guidance (attachment 6) was presented as a starting point. Comments on the draft guidance are summarized in the following paragraphs.

Steve Gerritson stated that any data added by the Work Groups should meet the quality assurance and completeness criteria applied to data currently in the database.

Dick Van Frank suggested that the guidance as written may be interpreted as allowing work groups to eliminate pollutants from their focus.

Miriam Lev-On stated that she is not convinced that the data in the STIRS database has been through a thorough quality assurance process and pointed out theat many of the test methods used may be out-dated. Ms. Lev-On also doubted that work groups would be able to identify control techniques using the emission test database. ERG stated that some of the test reports contain HAP measurements at the inlet and outlet of control devices and

that these results and the type of control device used are included in the database. Fred Porter stated that work groups will be performing preliminary reviews of the data to determine what pollutants may be emitted and what control techniques may be in place and that detailed quality assurance of all of the data is not currently a concern for the initial uses of the database. In the future, if certain test data are being used to develop numerical emission limits, a more detailed quality review will be needed. Greg Adams pointed out that work groups will need to use the emissions data eventually and expressed concerns regarding its quality.

Bob Palzer asked that work groups investigate relationships between HAP's and criteria pollutant, considering whether criteria pollutants can be used as surrogates for HAP's and the effect of controlling one on emissions of the other.

Jim Stumbar stated that it is imperative to correlate emission data with operating data and design data and expressed a concern about whether the database will provide the information to do this.

The role of the Work Groups in identifying and seeking to fill data gaps was discussed by several members and wording clarifications were suggested.

Keith Harley stated that the emission test database review guidance should be consistent with the inventory database review guidance.

Changes were made to the draft guidance during the meeting to reflect the comments. The Coordinating Committee then reached consensus on Guidance to Work Groups for review and use of the emission test database. The guidance agreed to by the Coordinating Committee is included as attachment 9.

7.0 DISCUSSION OF THE DEFINITION OF "SOLID WASTE"

Fred Porter stated that the EPA realizes that the definition of solid waste is a concern to many Work Group members. Mr. Porter cautioned that the definition will not be resolved quickly. Mr. Porter added that, if a subgroup is formed to develop a recommended definition, it should not divert effort or resources from reviewing and updating the ICCR databases.

Jim Stumbar, representing the Boiler Work Group, stated that the Work Group is concerned about the definition of solid waste because many materials that could be considered solid waste, such as wood, biomass, bituminous gob and anthracite culm, are burned in boilers. Mr. Stumbar stated that the Boiler Work Group has formed a subgroup to develop draft definitions for fuel and solid waste. Mr. Stumbar added that the Boiler Work Group realizes that developing the definitions will take time. Mr. Stumbar stated that the Boiler Work Group intends to work with members of the Incinerator and Process Heater Work Groups because all three Work Groups will be affected by the definition.

Jeff Shumaker, representing the Incinerator Work Group, stated that the definition of solid waste is important to developing the scope and structure of the Incinerator Work Group and identifying potential subcategories, which is work the Work Group has been directed to undertake. Mr. Shumaker added that the Incinerator Work Group is interested in supporting the Boiler Work Group’s efforts to develop a definition.

John Ogle, representing the Process Heater Work Group, stated that the group is focusing its current efforts on the database but is also interested in the definition of solid waste. Mr. Ogle predicted that defining solid waste will ultimately become a critical path issue for the group.

Marvin Schorr, representing the Combustion Turbine Work Group, stated that it is difficult to determine whether his work group will be effected by the definition of solid waste until it

is known whether the definition will include liquids burned in turbines.

Steve Gerritson asked how EPA plans to approach defining solid waste and whether the development of a solid waste definition should be coordinated with definitions used in other rules. Fred Porter stated that EPA will coordinate among its offices during development of a definition.

Keith Harley asked if the definition developed should clarify the existing RCRA definition of solid waste or if a new definition should be developed. Mr. Harley stated that answering this question will determine whether a subcommittee can address this issue. Several Coordinating Committee members agreed and expressed support for the formation of a subcommittee to address the solid waste definition issue.

After this discussion the Coordinating Committee decided to form a subcommittee to prepare a proposal about how the ICCR should address the definition of “solid waste.” The subcommittee will consider the various issues and concerns regarding the solid waste definition and develop recommendations or options about how to proceed with or approach defining solid waste in the ICCR. The subcommittee should present their recommendations or options on how to proceed to the Coordinating Committee at its July meeting. The following members of the Coordinating Committee volunteered to be members of this subcommittee: Alex Johnson, Marvin Schorr, Jim Stumbar, Fred Porter, John Ogle, Bill O’Sullivan, Paul Eisele, and Jeff Shumaker.

In conclusion, Fred Porter suggested that anyone who has concerns about the definition of “solid waste” should prepare material (in writing if possible) and provide it to the subcommittee so that the subcommitee can consider it in developing approaches or recommendations.

8.0 PRESENTATIONS ON OTHER EPA PROGRAMS OF ICCR INTEREST

Representatives of EPA presented information to the Coordinating Committee about three EPA programs of interest to the ICCR. These presentations and the discussion that followed are summarized in the following sections.

8.1 Specific Pollutants Program

Laurel Driver presented information on the Specific Pollutants Program developed in accordance with section 112(c)(6) of the Clean Air Act (the Act). Copies of the materials used in this presentation are included as attachment 10 (pages 2 to 7).

The purpose of this program, as defined in the Act, is to "list categories and subcategories of sources assuring that sources accounting for not less than 90 per centum of the aggregate emissions of each such pollutant are subject to standards under subsection (d)(2) or (d)(4)" (i.e., MACT or GACT standards, respectively). Ms. Driver explained that the program is designed for specific HAPs (alkylated lead compounds, polycyclic organic matter (POM), hexachlorobenzene, mercury, polychlorinated biphenyls (PCBs), 2,3,7,8-tetrachloridibenzofurans and 2,3,7,8-tetrachlorodibenzo-p-dioxin). A draft source category/subcategory listing for these HAPs is due out in June of 1997, with a final version to be available in December. Ms. Driver presented a list of sources that could potentially overlap with the sources being considered by the ICCR.

Technical issues remain that EPA is investigating during final development of the source category listing for this program. The examples provided include ambiguities in the definition of POM and toxic equivalency determinations for dioxins and furans.

8.2 Urban Air Toxics

Chuck French presented information on the Urban Air Toxics Program developed in accordance with sections 112(c)(3) and 112(k) of the Act. The purpose of this program, as defined in the Act, is to “achieve a substantial reduction in emissions of hazardous air pollutants from area sources and an equivalent reduction in the public health risks associated with such sources including a reduction of not less than 75 per centum in the incidence of cancer attributable to emissions from such sources.” Copies of the materials used in this presentation are included as attachment 10 (pages 8 to 12).

The goal of this program is to reduce the most carcinogenic pollutants in urban areas and to improve air quality. Efforts of the program to develop the list of the “dirty 30" urban air pollutants (i.e., the 30 most toxic airborne compounds in urban areas) are being coordinated with efforts being conducted under section 202(l) for mobile sources. The biggest problems facing EPA in the Urban Air Toxics Program are the limits on the science and the data available. The final study for this program is scheduled for completion in September of 1998.

8.3 Great Waters Program

John Ackermann presented information on the Great Waters Program developed in accordance with section 112(m) of the Act. The purpose of this program, as defined in the Act, is to “identify and assess the extent of atmospheric pollutants...to the Great Lakes, the Chesapeake Bay, Lake Champlain, and coastal waters.” Copies of the materials used in this presentation are included as attachment 10 (pages 13 to 20).

8.4 Discussion of EPA Presentations

Rich Anderson asked if EPA has looked at David Cleverly’s inventory of dioxin congeners in the United States. An EPA representative responded that the inventory mentioned has been

examined by EPA and that the inventory uses TCDD toxic equivalents.

Rich Anderson asked if 1990 is the baseline year for data specified in the statutes. An EPA representative responded that it is not required that 1990 be used as the baseline year. That year was chosen as a common baseline because it was the year of amendments to the Act. Mr. Anderson stated that there have been significant reductions in the toxic emissions from municipal waste combustors (MWCs) since 1990 and suggested that the 1990 baseline emissions estimate may not an accurate depiction of current emission levels. An EPA representative responded that changes such as this will be reflected in the final reports.

Rich Anderson asked if the cancer reductions that must be determined are theoretical projections and, if so, warned that exact projections cannot be made from studies conducted on animals. An EPA representative agreed and responded that the analysis of cancer incidence reductions is likely to be more qualitative than quantitative.

Rich Anderson asked if the studies will account for net generation of methyl mercury from wetlands. An EPA representative responded that this issue has been noted but not investigated in detail.

Alex Johnson asked whether EPA is coordinating the list of sources identified through these programs with the ICCR database of emission sources. An EPA representative replied that EPA is making efforts to coordinate among programs as much as possible to avoid redundancy in regulation. In response, Mr. Johnson suggested that the draft list of emission sources developed under these other EPA programs be incorporated into the ICCR. He also suggested that EPA may need to regulate sources that are below the “major source” size cut-off to achieve the 90 percent and 75 percent reductions dictated in the Act.

Jeff Shumaker asked how EPA will determine which sources to regulate under section 112(c)(6). An EPA representative responded that EPA initially looked at the category listing they developed and compared it to the section 112 regulations already in existence or under development. Any sources of the section 112(c)(6) pollutants not already addressed will be considered for regulation. The intention of the Specific Pollutant Program is to assure that all sources of the pollutants listed in the section 112(c)(6) are being regulated.

Jeff Shumaker asked how the risk of the “dirty 30" is being investigated relative to residual risk assessments. An EPA representative responded that the residual risk assessments are conducted to determine if adverse risks remain after regulations have been developed. There is potential for overlap between residual risk assessment and the Urban Air Toxics program if any of the “dirty 30" are pollutants of concern identified during investigation of residual risk.

Jeff Shumaker asked what sources of airborne PCBs exist. An EPA representative explained that electric transformers containing PCBs are still in operation and may leak PCBs. EPA has also found recent studies showing that some PCBs cycle in the environment. For example, PCBs in Lake Michigan could become airborne and be deposited in Lake Erie. The goal of the Great Waters Program is to determine the sources of pollutants such as PCBs and how the pollutants cycle in the environment.

Bill O’Sullivan asked EPA to clarify the purpose of the Specific Pollutants Program. An EPA representative explained that there are many triggers between section 112(c) subsections and 112(d) regulation. The program is designed to assure that sources of section 112(c)(6) pollutants are subject to section 112(d)(2) or 112(d)(4) regulations as needed. Data on the sources and the pollutants must be assessed before regulatory assignments for regulation as MACT or GACT can be made. At this

point, the science and economics still need to be assessed before policy decisions, such as the decision to list another source for regulation, can be made.

Dick Van Frank asked whether the ICCR should be considering the sources identified by these programs, as well as these programs, when setting MACT standards. An EPA representative responded that these programs are still emerging and do not drive the ICCR. As the source category listings are completed and particular concerns are identified by these programs, the ICCR should remain aware of these programs' progress. If a source category can be addressed logically in the ICCR, the ICCR should consider it.

Dick Van Frank asked what year is being used as the baseline for the cancer incidence rate and whether EPA is distinguishing among types of cancer. An EPA representative responded that the baseline year is 1990 and that the incidence rate of various types of cancer will probably not be evaluated separately; the program may not be that detailed in its analysis. The assessment may be a qualitative attempt to answer the question, "Are we reducing emissions of carcinogens?"

Dick Van Frank asked if the Great Waters Program is investigating endocrine disruptors. An EPA representative responded that the program is not currently considering this class of chemicals. However, the program will take into account new health and science programs not available in 1990 (i.e., investigation of endocrine disruptors) as data become available.

Greg Adams expressed concern of potential overlap among the programs presented and the ICCR. His hope had been that the limits on these programs would help define the boundaries of the ICCR. For example, Mr. Adams had hoped that very small sources would be addressed under section 112(k) and would, therefore, not need to be considered by the ICCR. Mr. Adams commented that EPA does not appear ready to address overlap issues now. Mr. Adams

requested that the EPA presenters attend a future Coordinating Committee meeting to provide updates on the progress of their programs. The EPA representatives agreed to coordinate presentations at another meeting with Fred Porter, the EPA Co-chair on the Coordinating Committee.

Miriam Lev-On commented that she had seen a paper approximately six months before the meeting that discussed an integrated EPA air toxics program or strategy. Ms. Lev-On asked the EPA presenters to clarify this issue. An EPA representative responded that a goal of EPA management is to emphasize coordination among programs. However, the representative was not aware of this specific paper and asked Ms. Lev-On to share the reference for it. EPA offered to update the Coordinating Committee on this issue at its July meeting.

Dick Van Frank, suggesting that there can be vast differences among urban air in various metropolitan areas, asked if EPA has a monitoring program with stations around the country. An EPA representative responded that EPA collects data from 50 to 100 monitoring stations nationwide.

9.0 REVIEW OF THE ICCR DOCUMENT

9.1 Discussion of Recent Revisions

As charged at the October 1 and 2 meeting in 1996, the subcommittee known as the “Group of Six” has been editing the ICCR document. Prior to the meeting the Group of Six distributed the final draft of the ICCR document to the Coordinating Committee. At this meeting the Coordinating Committee strived to reach consensus on the proposed revisions to the ICCR document.

Fred Porter reviewed changes to the document that were made in response to an improved understanding of the FACA process and the need to follow the procedures of the executive agency (i.e., EPA) for which the advisory committee was chartered. Among the changes include the designation of the EPA Co-chair as the

Designated Federal Official (DFO). The DFO must open and close all meetings and can end discussion or a meeting when it is no longer in the agency's interest. The DFO must also certify the minutes of the meetings. EPA feels that it is appropriate for the Work Groups to follow these procedures even though they have not been chartered under FACA. The Coordinating Committee reached consensus on these changes.

Rich Anderson highlighted contextual and organizational changes made to the document. Among the changes were the following: specification that the Work Group representative to the Coordinating Committee be called the Work Group Stakeholder Co-chair; inclusion of example pollution prevention definitions in the appendix; removal of the appendix on the handling of confidential business information (EPA policies governing handling of CBI will be placed on the TTN); and minor modifications to the procedure for allowing non-members to participate in meetings.

There was some discussion of the specification that the Work Group representative to the Coordinating Committee be called the "Work Group Stakeholder Co-chair." Fred Porter clarified that this change had been made to make the terminology used in the document consistent. Work Groups still have the flexibility to split the co-chair responsibilities between two people. For example, some Work Groups have a "Work Group Stakeholder Co-chair," who represents the Work Group on the Coordinating Committee and a "Work Group Stakeholder Co-chair alternate," who is responsible for assisting the EPA Co-chair in the administrative details of running Work Group meetings. This flexibility is specifically discussed in section 5.5 of the ICCR document under the subheading of "Responsibilities and Selection of Work Group Stakeholder Co-chair." Coordinating Committee members suggested wording changes to this section to improve its clarity. A representative of the IC Engines Work Group also

suggested that the Work Groups review their meeting minutes to be sure that, if they have selected a Stakeholder Co-chair and an alternate, their roles are properly defined. After this discussion, the Coordinating Committee reached consensus on the current version of the ICCR document with the wording revision to section 5.5. The approved document will be posted to the TTN with these changes made and the redline/strikeout formatting removed.

9.2 Discussion of Future Changes

It was noted that the ICCR document can be modified by the Coordinating Committee to incorporate new topics and procedures as the ICCR progresses, and, as changes are made, the document can be reissued as a new version. Committee members discussed some topics that may be appropriate for future versions.

Keith Harley suggested that the Coordinating Committee may need to revisit some issues, such as to enhance the process for public participation. Despite efforts to open the ICCR to the public, some Coordinating Committee members expressed concern that the procedures to be followed may be too intimidating. In addition, Mr. Harley suggested that the ICCR document include guidance on certain executive orders (E.O.s), such as those that address environmental justice concerns, to assure that these will be treated uniformly among the Work Groups. Alex Johnson noted that there are many new E.O.s (e.g., those on children's health) that the Coordinating Committee should consider incorporating into the document. The committee should keep these E.O.s in mind as well as other EPA programs.

Miriam Lev-On asked EPA to clarify how E.O.s should be used by the Coordinating Committee and Work Groups when developing regulations. Leslye Fraser responded that, although the Act is the guiding statute during regulatory development, several E.O.s must be considered. EPA must demonstrate compliance with certain

E.O.s (such as Unfunded Mandates and children's health concerns) prior to promulgation of a standard. This language appears at the end of the preamble to a regulation. Several Coordinating Committee members asked EPA to describe at a future meeting the E.O.s the ICCR should be considering.

Rich Anderson suggested that anyone wishing to make additional changes submit them in writing along with proposals for modified text. Fred Porter suggested that additional concerns be posted on the TTN as proposals or briefing material for future Coordinating meetings. Mr. Porter encouraged Coordinating Committee members with concerns about particular issues to educate the committee about them and noted that the ICCR document is a working document that can be modified as the ICCR progresses.

10.0 PUBLIC COMMENTS

Michael Fisher, a representative of the American Plastics Council and the Boiler Work Group, expressed a concern over a comment made by Fred Porter that the EPA may be reluctant to accept a new definition of solid waste. Mr. Fisher stated that he works with engineered fuels and believes it is possible to develop a solid waste definition.

Bob Bessette, a representative of the Council of Industrial Boiler Operators and the Boiler Work Group, requested that time be allowed for public comments after each major topic of discussion. Mr. Bessette also stated that, in considering control technologies, there is a difference in new and existing technologies and that they should not be considered in the same light.

Jim McCarthy of the Gas Research Institute (GRI) stated that because the test reports used to develop the emission test database were submitted to State agencies, they meet certain criteria and provide similar information. Mr. McCarthy provided

that test reports available through GRI include valuable parameters for correlating operating conditions and emissions. Mr. McCarthy requested guidance from the Testing and Monitoring Protocol Work Group on the criteria the test reports must meet to be considered. Mr. McCarthy requested guidance so that existing reports cold be judged against it and so that it can be used in completing reports in progress. Fred Porter replied that EPA is meeting with GRI and that GRI data can be used for the initial uses of test data.

David Marrack, a physical chemist and physician, expressed a concern landfill gas combustion is not being addressed. Dr. Marrack also asked if exhaust temperatures are included in the emission test database. Fred Porter explained that the fuels discussed during the database presentation are only those for which test reports are currently available in the database.

Lee Gilmer of Texaco asked that, at future meetings with presentations, the Coordinating Committee allow time for the public to ask questions of the presenters.

Tim Hunt of the American Petroleum Institute suggested that, as a step in information collection and evaluation of data gaps, emphasis be placed on determining which data gaps are most important to fill and assessing how difficult filling the data gaps will be.

Jane Williams of California Communities Against Toxics relayed concerns expressed during the environmental caucus held on May 20. Ms. Williams emphasized the importance of considering E.O.s when developing regulations via the ICCR and suggested revising the ICCR document to include guidance on E.O.s. Ms. Williams also recommended that the National Environmental Justice Advisory Committee (NEJAC) and Dr. Landrigan of EPA’s new office on children’s health issues be contacted to encourage involvement.

11.0 UPDATES FROM EPA

EPA provided updates on several issues at this meeting. These updates are described in the sections that follow.

11.1 Small Business Information

Fred Porter explained that EPA has distributed and asked people to fill out a small business information form to evaluate the success of the ICCR in achieving small business representation. Mr. Porter stated that small business is a stakeholder that EPA feels is important to have "at the table."

11.2 Legal Issues and Co-development of Regulations

Leslye Fraser of EPA's Office of General Counsel offered EPA answers to some legal issues raised at previous meetings. These issues included questions about payment for ICCR meeting expenses and about the priority of development of new source performance standards (NSPS) versus MACT standards.

Ms. Fraser explained that the ICCR is an EPA obligation and, as such, EPA must pay for the meeting space and meeting minutes. Meetings can be held at facilities not owned or rented by EPA provided that 1) the entity offering the meeting space as an alternative incurs no expenses from providing the meeting space and 2) the entity allows any member of the public to attend the meeting. In response to a question, Ms. Fraser clarified that the phrase "incur no expenses" is not a net cost issue; even if a party will save more money from reductions in air travel, that party cannot spend any portion of the difference to fund meeting expenses for the ICCR. EPA must cover all costs. However, EPA cannot provide refreshments at meetings, nor can EPA solicit or even suggest that refreshments be brought by another party. In response to a question, Ms. Fraser indicated that if others wish to provide refreshments at meetings, EPA, like other meeting

attendees, can accept certain refreshments as a gift if it meets Federal ethics requirements.

Ms. Fraser investigated the schedules for development of NSPS and MACT standards and the potential to avoid duplicative examination of sources through co-development of rules in the ICCR. Ms. Fraser emphasized that EPA is committed to meeting the Clean Air Act schedule for the section 112 and 129 standards by the year 2000 and that this schedule should remain a priority. The NSPSs do not have this deadline. How best to handle regulatory co-development is dependent on this schedule and on what makes sense.

An NSPS for a source category may not be on the same regulatory development schedule as the MACT standard being developed in the ICCR. However, when possible, cross-examination of sources should be a goal of the ICCR to avoid duplicative examination of sources by EPA. There may also be consideration of equity in how sources are treated. For example, for sources burning solid waste, section 129 requires development of standards for certain criteria pollutants as well as certain HAPs, and such standards are co-promulgated under section 111. A similar combustion device that does not burn solid waste may be regulated for HAPs under section 112. For equity with regard to criteria pollutant coverage, examination of the source for development of an NSPS under section 111 may be worthwhile.

12.0 DISCUSSION OF NEXT MEETINGS

The Coordinating Committee schedule of upcoming meetings will be retained as follows:

- July 22 and 23: meeting in Long Beach, California;
- September 16 and 17: meeting in Research Triangle Park, North Carolina; and

- November 18 and 19: meeting in Houston, Texas.

In planning future meeting agendas, consideration will be given to public suggestions for accommodating public comment on each major topic and for providing time for the public to ask questions when presentations are made by outside parties.

12.1 Action Items

The following action items will be accomplished prior to the next meeting of the Coordinating Committee:

- Fred Porter will investigate the development of an integrated EPA air toxics program and report back to the CC at its July meeting.

- EPA will post a copy of the revised ICCR document on the TTN.

- EPA will put a briefing package on “solid waste” definitions on the TTN.

- Anyone who has concerns regarding the “solid waste” definition should contact the ad-hoc subcommittee, preferably in writing, about their concerns.

- EPA will post the presentations on the Specific Pollutant Program, the Urban Air Toxics Program, and the Great Waters Program on the TTN as a separate item or in the meeting minutes as soon as possible.

12.2 Issues in the “Parking Lot”

Several topics have been mentioned or partly discussed at previous Coordinating Committee meetings. Some of these issues have been addressed and some have been held over in the “Parking Lot” for future committee meetings. The following lists identify previous and current “Parking Lot” issues:

<u>Issues from Previous Addressed at the May 21 Meeting</u>

- Parallel EPA Programs (Interest was expressed at the January and March Coordinating Committee meetings for EPA updates on the Great Waters Program, Urban Air Toxics Program, Specific Pollutants Program of section 112(c)(6). Presentations were given on all three of

these programs at the May 21 meeting. See section 9.0 of this document);

- NSPS versus MACT Standard Priority (The Turbine Work Group raised a question of NSPS versus MACT Standard priority at the January CC meeting. EPA provided guidance on prioritization at the May 21 meeting. See section 11.2 of this document);

- Pollutant Lists (The Coordinating Committee requested pollutant lists and health information at March meeting. EPA posted draft lists of priority pollutants based on health considerations and other criteria on the TTN prior to the May 21 meeting.);

- ICCR Document (At its March meeting the Coordinating Committee requested that the ICCR document be revised to incorporate changes discussed at the January and March meetings. At its May 21 meeting the Coordinating Committee reviewed and reached agreement on ICCR document. EPA will post the final on the TTN shortly.);

- Emission Testing (Emission testing was discussed at the March meeting and was addressed at May 21 meeting when the committee developed guidance to the Work Groups for review and use of test data, including direction to Work Groups to identify test data gaps, try to fill them, and recommend testing needs at future Coordinating Committee meetings (see section 6.0). EPA has prepared a rough estimate of testing budget needs and submitted it to their management to consider in next year's budgeting.);

- Investigation of Legal Barriers to Stakeholders' Sharing ICCR Meeting Expenses with EPA (At the March Coordinating Committee meeting, EPA agreed to investigate any legal issues surrounding the sharing of meeting expenses for a FACA committee chartered at EPA's request. At the May 21 meeting, Leslye Fraser of EPA's OGC reported her findings (see section 11.2).);

- Access Training (Interest was expressed at the March Coordinating Committee meeting for training on Microsoft Access software. EPA responded by email that EPA cannot provide training. Others (e.g., API) may be looking into training possibilities.);

Issues Held Over for Future Meetings:

- Process Heaters Regulatory Overlap Issues: (At the March meeting, the Coordinating Committee asked EPA to investigate whether other MACT standards will regulate the types of process heaters listed on Tables 2 and 3 of the Process Heater Work Group status report presented at that meeting. EPA is in the process of doing this and will report back to the CC in the future.);

- Economic Incentives and Regulatory Strategies (During discussion with EPA Assistant Administrator Mary Nichols at the January meeting, a presentation of innovative control strategies and techniques was suggested. Steve Gerritson offered to present information from the economic incentives and regulatory strategies FACA at the July Coordinating Committee meeting. This presentation would last about 30 minutes.);

- Other Regulatory Programs That May Impact the ICCR (Members requested information on various activities (e.g., EPA's Utility Air Toxics program, boiler NOx NSPS, NAAQS, OTAG, etc.) and updates on the findings of the Specific Pollutant, Urban Air Toxics, and Great Waters Programs as these efforts progress so that the committee can consider consistency among related programs.);

- Executive Orders to be considered during the ICCR; and

- Small Business issues dictated by the Small Business Regulatory Enforcement Fairness Act (SBREFA).

ATTACHMENTS

Attachment 1: May 21, 1997 Coordinating Committee Meeting Agenda
Attachment 2: May 21, 1997 Coordinating Committee Meeting Attendees
Attachment 3: Work Group Membership and Alternate Nominations and Withdrawals
Attachment 4: ICCR Milestones and Accomplishments to Date
Attachment 5: Overview of ICCR Inventory Database

Attachment 6: Cover Note and Draft Guidance to Work Group for Database Review
Attachment 7: Guidance to Work Groups for Reviewing ICCR Inventory Database
Attachment 8: Overview of ICCR Emission Test Database
Attachment 9: Guidance to Work Groups for Reviewing the ICCR Emission Test Database
Attachment 10: Presentation on EPA's Specific Pollutants Program, Urban Air Toxics Program, and Great Waters Program

Attachment 1

May 21, 1997 Coordinating Committee Meeting Agenda

INDUSTRIAL COMBUSTION COORDINATED RULEMAKING
May 21, 1997, Coordinating Committee Meeting

Regal University Hotel, 2800 Campus Walk Avenue
Durham, North Carolina

AGENDA

Note: "Business Casual" is acceptable attire for all Coordinating Committee and Work Group meetings

Major Meeting Goals: _

- That the CC gain an appreciation of the current status and contents of the ICCR inventory and emissions databases
- That the CC provide guidance to the Work Groups on review and revisions of the two databases for use in the ICCR
- Present and finalize changes to the ICCR document
- Clear out "parking lot" issues from previous meetings

8:00 a.m. Welcome and Agenda Review

8:15 a.m. Questions or Comments About Work Group Status Reports Posted to the TTN

8:45 a.m. Milestone Review and Accomplishments to Date

9:00 a.m. Review Progress and Status of ICR

9:15 a.m. ICCR Inventory Database

- Presentation of status and content
- Discussion of proposed guidance to Work Groups regarding review, QA, and use of inventory database
- Develop consensus recommendations for Work Groups

10:15 a.m. Break

10:45 a.m. ICCR Emissions Database

- Presentation of status and content

- Discussion of proposed guidance to Work Groups regarding review, QA, and use of emissions (i.e. STIRS) database
- Develop consensus recommendations for Work Groups

12:15 p.m. Public Comment

12:30 p.m. Lunch

1:30 p.m. Group of Six Report: Revisions to ICCR Document

- Revisions resulting from CC review and discussion
- Revisions resulting from EPA/FACA policies and requirements

2:15 p.m. Initial Plenary Discussion of MACT and New Source Performance Standards

2:45 Break

3:00 p.m. Congressionally Directed Activities and Research Under Section 112: Specific Pollutant Program, Urban Air Toxics Program, Great Waters Program

- Presentation regarding: EPA's mandate for the three programs, EPA's plan for achieving these mandates and EPA's progress to date, and possible outcomes that would influence regulations being developed through the ICCR Process
- Questions and Answers

4:00 p.m. Pollutants of Interest: Various Lists Available from EPA

4:15 p.m. Public Comment

4:30 p.m. Budget Update

4:35 p.m. Discussion of Parking Lot Issues Identified During the Day's Discussion

5:20 p.m. Proposed Items for Next Meeting Agenda

5:30 p.m. Review and Agree to Bullet Summary

5:45 p.m. Public Comment

6:00 p.m. Adjourn*

* Please note that the "MACT Floor Primer" will begin at 7:00 p.m. and adjourn at approximately 9:00 p.m.

Attachment 2

May 21, 1997 Coordinating Committee Meeting Attendees

List of Attendees at the
ICCR Coordinating Committee Meeting
March 21, 1997 Durham, NC

John Ackermann	Greg Adams
Amanda Agnew	Sam Allen
Richard Anderson	Lisa S. Beal
Doug Bell	Bob Bessette
John Blair	John J. Bloomer
Andrew M. Bodnarik	Michael S. Brand
Atly Brasher	David Brooks
Wendell Brough	Gordon M. Brown
Roy H. Carwile	A.J. Cherian
Sam Clowney	Linda Coerr
Kimberly Davis	Gerald Doddington
Donald C. Dowdall	Rand F. Drake
Laurel Driver	Alexandra Dapolito Dunn
Jim Eddinger	Paul J. Eisele
Charles J. Elder	John Fanning
Bruno A. Ferraro	Frank (Francis A.) Ferraro
Michael M. Fisher	Leslye Fraser
Chuck French	Mike P. Gallagher
Steve Gerritson	Greg Gesell
Lee K. Gilmer	Steve Hagle
Keith I. Harley	Michael D. Harley
Terry Harrison	William R. Heater
Michael Hewett	Reese Howle
Tim Hunt	John Huyler
G. Alex Johnson	Jim A. Jordan
Charles W. Keffer	John M. Klein
Dennis R. Knisley	Greg C. Kraft
Mary Lalley	Arthur Lee

List of Attendees at the
ICCR Coordinating Committee Meeting
(Continued)

Miriam Lev-On	David T. Lordi
Joseph Mackell	Dennis Marietta
David Marrack	Bill Maxwell
Doris Maxwell	James M. McCarthy
Dave Montgomery	Robert A. Morris
Elsie Munsell	Vick Newsom
William J. (Bill) O'Sullivan	John W. Ogle
Peter H. Oppenheimer	John Paul
Bill Perdue	Fred Porter
John R. Preczewski	Jeffrey L. Roop
Sims Roy	Glenn Sappie
David C. Schanbacher	Marvin Schorr
James G. Seebold	Gunseli Sagun Shareef
Jeffrey L. Shumaker	George F. Smith
Jeffrey C. Smith	Michael Soots
Robert W. Stachowicz	Oliver Stanley
James P. Stumbar	Karluss Thomas
Mae Thomas	Jorge Torres
Paul M. Tucker	R.M. (Dick) Van Frank
Robert W. Welch	Chad White
William O. Wiley	Jane Williams

Attachment 3

Work Group Membership and Alternate Nominations and Withdrawals

INDUSTRIAL COMBUSTION COORDINATED RULEMAKING

Work Group Membership Nominations

Boiler Work Group
- Paul Tucker (International Paper)

Process Heater Work Group
- Jane Williams (California Communities Against Toxics)
- Gregory Johnson (Shell Development Co)

Incinerator Work Group
- Michael Blumenthal (Scrap Tire Management Council)
- Tom Tyler (Institute of Scrap Recycling Industries)
- Dick Van Frank (Audubon Society)
- Ed Wheless (Los Angeles County Sanitation District)

Stationary Internal Combustion Engine Work Group
- None

Stationary Combustion Turbine Work Group
- None

Economic Analysis Work Group
- None

Testing and Monitoring Protocol Work Group
- Rich Hovan

INDUSTRIAL COMBUSTION COORDINATED RULEMAKING

Work Group Membership Nominations - Alternates

Boiler Work Group
- None

Process Heater Work Group
- None

Incinerator Work Group
- Member: Ed Wheless Alternate: Brian Guzzone (Solid Waste Assn of North America)

Stationary Internal Combustion Engine Work Group
- None

Stationary Combustion Turbine Work Group
- Member: Ben Carmine Alternate: J. Derek Furstenwerth

Economic Analysis Work Group
- None

Testing and Monitoring Protocol Work Group
- None

INDUSTRIAL COMBUSTION COORDINATED RULEMAKING

Work Group Membership Withdrawals

Boiler Work Group
- Russell Andrews (International Paper)
- Gary Grimes (Oregon DEQ)

Process Heater Work Group
- Walter Farmayan (Shell Development)

Incinerator Work Group
- Lorraine Anderson (Maryland Dept of Environment)
- Steven Atkinson (Crawford Equipment and Engineering)
- Todd Eckert (Eli Lilly & Co)

Stationary Internal Combustion Engine Work Group
- None

Stationary Combustion Turbine Work Group
- None

Economic Analysis Work Group
- None

Testing and Monitoring Protocol Work Group
- None

Attachment 4

ICCR Milestones and Accomplishments to Date

Milestones and Accomplishments to Date

Milestone/Activity	Date Accomplished
Coordinating Committee established & first meeting held	October 1996
Coordinating Committee established Work Groupsk, ICCR organizational structure, and procedural ground rules	October 1996 (additional refinements in Jan 1997 & May
First Work Group Meetings held	October 1996
Data collection approach developed	November 1996 - January 1997
Available EPA data assembled into ICCR inventory	January 1997
ICR mailout initiated	March 1997
Available State data assembled into ICCR inventory	April 1997
Available emission test data assembled into ICCR emission	May 1997
Work Groups began review and update of databases	May 1997

Upcoming Activities

- Review and update inventory and emission databases
- Begin using databases to characterize the population, identify potential subcategories, and begin developing model plants
- Identify and fill remaining data gaps

Attachment 5

Overview of ICCR Inventory Database

ICCR Combustor Inventory Database
May 21, 1997

Status
- New Release ICCR Version 2.0
- Added Data from 16 Electronic State Databases (WA, VT, MN, MI, ME, PA, NJ, WI, IL, CA, TX, TN, FL, NC, WV, and MO)
- Added Data from ICWI/OSWI Database
- Some Changes to the Design of the Database

Comparison of Counts

	ICCR V1	ICCRV2	% Change
Facilities	31,064	44,925	45
Boilers	45,227	68,968	52
Heaters	20,578	30,375	48
Engines	19,781	28,015	42
Turbines	3,293	5,435	65
Incinerators	4,449	11,621	161
Flares	1,066	1,845	73

Database Organization
- Data Level: Facility, Combustor, Segment, Pollutant.
- Main Tables: Facility, Inventory, and Fuels
- Additional Information Tables: Emissions, Permit, APCD, APCD Efficiency, Non-fossil/Waste, SIC code, Ph, B & I, T & E, and Mailing

Data Fields
- About 130 Fields
- Example Data Fields
  - Facility Name
  - Unit Capacity
  - Fuel Type
  - SCC code
  - Control Device
  - Combustor Description

ATTACHMENT 6

Cover Note and Draft Guidance to Work Groups for Database Review

COVER NOTE

FROM: Fred Porter, EPA
TO: ICCR Coordinating Committee
DATE: May 13, 1997
SUBJECT: Draft Guidance for Review and Use of ICCR Inventory Database and ICCR Emission Test Database

As you are aware, Version 2.0 of the ICCR Inventory Database has recently been released, and the Emission Test Database will be released soon. At the Coordinating Committee meeting on May 21, we would like to reach consensus on the general goals for review, update, and initial use of the two databases. The various Work Groups are beginning to review the databases, and the goals agreed upon at the Coordinating Committee would be given to the Work Groups to provide consistent guidance for their activities.
Attached are two handouts that we would like to discuss at the Coordinating Committee meeting on May 21. The first contains draft goals for review and initial use of the ICCR Inventory Database, and the general flow procedures for suggestions to change to the database. This handout will be discussed during the 9:15 am portion of the agenda "ICCR Inventory Database, discussion of proposed guidance to Work Groups". The goal of this discussion will be to develop a consensus regarding the goals that can be given as guidance to the Work Groups.

The second handout contains draft goals for review and initial use of the ICCR Emissions Database. This handout will be discussed during the 10:45 am portion of the agenda "ICCR Emissions Database, discussion of proposed guidance to Work Groups". Again, our objective during the meeting is to develop a consensus regarding goals for review and initial use of the Emissions Database to be given as guidance to the Work Groups.

Note that the EPA Work Group Co-chairs will be circulating and posting on the TTN more detailed procedural guidance on how to use the databases to implement the goals. Many Work Groups are already beginning to review and use the data, and Work Group members as well as EPA have developed suggestions for how to accomplish these goals effectively. These suggestions are being incorporated in EPA's draft detailed guidance. We do not plan to discuss these details at the Coordinating Committee, because it seems more appropriate for the Committee to be concerned with providing consistent goals and direction. The detailed mechanics of how to implement these goals are best left to the Work Group level where the detailed database reviews will actually be conducted. EPA co-chairs will discuss the detailed guidance at the Work Group meetings, and will modify it, if needed, to address any changes to the overall goals that are agreed upon at the May 21 Coordinating Committee meeting.

We hope you find the attachments useful, and look forward to a productive discussion of them at the May 21 meeting.

ATTACHMENT 1. MATERIALS FOR ICCR INVENTORY DATABASE DISCUSSION

INVENTORY DATABASE

DRAFT GUIDANCE TO WORK GROUPS
ON DATABASE REVIEW AND UPDATE

1. Identify readily apparent misclassified units to be given to other Work Groups

2. Identify and correct obvious errors

3. Identify and resolve easily identifiable duplicate facilities and duplicate combustion units

4. Add known facilities and combustion units.

INVENTORY DATABASE

DRAFT GUIDANCE TO WORK GROUPS
ON INITIAL USE OF DATABASE

1. Characterize combustion unit population and develop model plants
   - Estimate the population
   - Identify preliminary subcategories
   - Develop model plants

2. Identify control technologies in use

3. Identify sources of test data by reviewing codes in inventory database

DRAFT

GENERAL PROCEDURES FOR MAKING CHANGES

The official ICCR inventory database is currently Version 2.0, as released on CD. Periodically, as changes are accumulated or ICR survey responses are received, the database will be updated, and a revised official version released on CD with a new version number.

The database has been separated into 6 files, based on type of combustion unit (e.g. boiler, stationary combustion turbine) and the Source Work Groups have been given their portion to review.

The following describes the general procedure/ flow of information for implementing changes to the database:

1. Work Group member suggests a change to the Source Work Group

2. The Source Work Group discusses the suggested change. If the Work Group agrees with the change, the Source Work Group EPA Co-chair is given the specifics of the change, including documentation of the reason for the change.

3. The Source Work Group EPA Co-chair coordinates internal review of the change within EPA, and gives the change to EPA's contractor to implement in the official database.

4. The contractor will make the change and will also keep the documentation of the change in an electronic file that can be made available when the database is re-released. If a facility is taken out of the ICCR because it is closed or does not belong within the scope of the ICCR, it will not be deleted, but will be moved to a separate file along with the reason.

5. After a number of changes are made, the database, and individual files for each type of combustion unit is re-released by EPA on CD with a new version number.

ATTACHMENT 2. MATERIALS FOR ICCR EMISSIONS DATABASE DISCUSSION

EMISSIONS DATABASE

PURPOSES OF INITIAL REVIEW

- To help identify pollutants of interest
- To help identify subcategories and to identify control techniques to reduce HAP emissions
- To gain an appreciation of the magnitude of HAP data available
- To identify and fill obvious data gaps

DRAFT GUIDANCE TO WORK GROUPS ON INITIAL REVIEW AND USE OF EMISSIONS DATABASE

1. Determine for which HAPs test data are available. Use in conjunction with other HAP lists to help identify pollutants of interest.

2. Characterize availability of emission data for:
    - potential subcategories (e.g. combustor types, fuels)
    - control techniques

3. Determine obvious data gaps and collect available test reports to fill gaps.

4. Compile data from collected test reports for entry into emissions database.

5. Covert data to common units for comparison.

6. Summarize data for each subcategory, control technique, and pollutant.

7. Identify remaining data gaps and recommend a test program to the Coordinating Committee.

ATTACHMENT 7

Guidance to Work Groups for Reviewing ICCR Inventory Database

INVENTORY DATABASE

DRAFT GUIDANCE TO WORK GROUPS ON DATABASE REVIEW AND UPDATE

1. Identify readily apparent misclassified or misassigned units to the EPA. Corrections will be given to other Work Groups.

2. Identify classification issues associated with current SCC definitions, forwarding them to EPA.

3. Identify obvious errors and recommended corrections to the EPA.

4. Identify and suggest how to resolve easily identifiable duplicate facilities and duplicate combustion units.

5. Identify known facilities and combustion units not in the data base to the EPA for addition. (in correct electronic format).

6. EPA Source Work Group Co-Chairs are responsible for rapid corrections and dissemination.

7. Ensure that source of data used to arrive at recommendations is clear and reflected in backup to recommendations when made.

DRAFT GUIDANCE TO WORK GROUPS ON INITIAL USE OF DATABASE

1. Characterize combustion unit population and develop model units for each combustor category.

   - Estimate the population
   - Identify preliminary subcategories
   - Develop model units

2. Identify control techniques.

3. Identify sources of test data by reviewing codes in inventory database. (Emissions data in the Emissions Database will be the primary source of information for developing emissions factors.)

INVENTORY DATABASE
General Procedures for Changes

Official Database V2.0 on CD
(overall file and 1 file for each Source Work Group)

Source Work Group Reviews
Database & Discusses Changes

Source Work Group EPA Co-Chair
Coordinates within EPA

EPA gives Changes to Contractor to Implement

Versions 3.0, etc. Released on CD

INVENTORY DATABASE

General Procedure for Changes -- Documentation

- Reason for making each change is documented by Source Work Group and given to EPA Co-Chair.
- EPA’s contractor will keep electronic file documenting changes.
- Facilities removed will be moved to another file and annotated (i.e., why was it removed), not deleted.

ATTACHMENT 8

Overview of ICCR Emission Test Database

Emission Test Database
May 21, 1997
Test Report Sources
- Review Process
- Database Structure
- Available Data
- Example Summaries

Test Report Sources
STIRS
- Scanned test reports from 15 States: CA, FL, IN, LA, MD, MI, MO, NC, NJ, OH, PA, TX, VA, WA, WI
- Majority of reports are from 1989-1992
- Available on CD (32 volumes)

AP-42
- External Combustion

Review Process
- Identified combustion sources
- Focused on HAPs (include section 112 and 129 pollutants)
- Did not include incomplete reports

Database Structure
- Access 2.0
- Two Tables:
  Unit information
  Test data
- Includes example queries and summaries

Unit Information
If Available:
- Facility and location
- Testing company, test date
- Type of fuel(s) burned during test
- Operating rate/load
- Control device type
- Unit size, manufacturer, model
- Important design/operating parameters

Test Data
- Entered data in its most "raw" form
- For each pollutant for each run: concentration, % O2, % moisture, exhaust flowrate, fuel flowrate, unit operating rate

- Test method used
- "ND" for non-detect
- Detection limit

Available Data
Number of Reports/Number of HAPs
- boilers and process heaters: 41/33
- incinerators: 115/60
- internal combustion engines: 103/43
- combustion turbines: 33/21

Available Data
Fuels - Majority of Tests
- boilers and process heaters: fuel oil (44%)
- incinerators: municipal-type solid waste (30%)
- i. c. engines: natural gas (51%)
- combustion turbines: natural gas (64%)
- others include: refinery gas, field gas, landfill gas, propane, fuel oil, coal, coke, biomass, wood, medical waste, sewage sludge, tires

Available Data
Fuel Distribution - Combustion Turbines
(chart showing percent of test reports for each fuel type: natural gas-64%, field gas-3%, distillate-24%, refinery gas-3%, not reported-6%)

Available Data
Fuel Distribution - Boilers and Process Heaters
(chart showing percent of test reports for each fuel type: fuel oil-45%, natural gas-2%, wood-10%, biomass-6%, coke and natural gas-6%, petroleum coke-4%, coal-26%, RDF-1%)

Example Emission Summaries
- Provided so that data can be compared
- Variety of formats
- Up to Work Groups to customize

ATTACHMENT 9

Guidance to Work Groups for Reviewing the ICCR Emission Test Database

EMISSIONS DATABASE

PURPOSES OF INITIAL REVIEW

- To gain an appreciation of the interplay between criteria and HAP emissions generation and control.
- To help identify subcategories and the availability of information on control technigues.
- Assess adequacy of database for the development of representative emission factors
- To gain an appreciation of the amount of emission data available.
- To identify and fill obvious data gaps with various sources of information.
- To identify additional sources of data, to gather data from these sources, to include data as appropriate subject to quality assurance guidelines, and to recommend additional data-gathering steps to EPA.

DRAFT GUIDANCE TO WORK GROUPS ON INITIAL REVIEW AND USE

1. Determine for which sources of HAPs and criteria pollutants test data are available.
2. Characterize availability of emission data for:
   - potential subcategories (e.g. combustor types, fuels)
   - control techniques evaluation
3. Determine obvious data gaps and gather available test reports to fill gaps.
4. Compile data from collected test reports for entry into emissions database.
5. Convert data to common units for comparison.
6. Summarize data for each subcategory, control technique, and pollutant.
7. Identify remaining data gaps and recommend an additional data collection program to the Coordinating Committee.

"These minutes represent an accurate description of matters discussed and conclusions reached and include a copy of all reports received, issued, or approved at the May 21-22, 1997, meeting of the Industrial Combustion Coordinated Rulemaking Coordinating Committee Meeting. Fred Porter."

EMISSIONS DATABASE

PROCEDURES FOR MAKING CHANGES

- Similar to ICCR Inventory Database changes
- Changes and additions go through Source Work Group EPA Co-chair for inclusion in official database.

“These minutes represent an accurate description of matters discussed and conclusions reached and include a copy of all reports received, issued, or approved at the May 21-22, 1997, meeting of the Industrial Combustion Coordinated Rulemaking Coordinating Committee Meeting. Fred Porter.”

Attachment 10

Specific Pollutants, Great Waters, and Urban Area Source Programs in Relation to the ICCR

(See file cc21my7x.wp6)

“These minutes represent an accurate description of matters discussed and conclusions reached and include a copy of all reports received, issued, or approved at the May 21-22, 1997, meeting of the Industrial Combustion Coordinated Rulemaking Coordinating Committee Meeting. Fred Porter.”